



**Minnesota Pollution
Control Agency**

520 Lafayette Road North
St. Paul, MN 55155-4194

MS4 SWPPP Application for Reauthorization

**for the NPDES/SDS General Small Municipal Separate
Storm Sewer System (MS4) Permit MNR040000
reissued with an effective date of August 1, 2013**
Stormwater Pollution Prevention Program (SWPPP) Document

Doc Type: Permit Application

Instructions: This application is for authorization to discharge stormwater associated with Municipal Separate Storm Sewer Systems (MS4s) under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program. **No fee** is required with the submittal of this application. Please refer to "Example" for detailed instructions found on the Minnesota Pollution Control Agency (MPCA) MS4 website at <http://www.pca.state.mn.us/ms4>.

Submittal: This MS4 SWPPP Application for Reauthorization form must be submitted electronically via e-mail to the MPCA at ms4permitprogram.pca@state.mn.us from the person that is duly authorized to certify this form. All questions with an asterisk (*) are required fields. All applications will be returned if required fields are not completed.

Questions: Contact Claudia Hochstein at 651-757-2881 or claudia.hochstein@state.mn.us, Dan Miller at 651-757-2246 or daniel.miller@state.mn.us, or call toll-free at 800-657-3864.

General Contact Information (*Required fields)

MS4 Owner (with ownership or operational responsibility, or control of the MS4)

*MS4 permittee name: City of Red Wing *County: Goodhue County
(city, county, municipality, government agency or other entity)
*Mailing address: 315 West Fourth Street
*City: Red Wing *State: MN *Zip code: 55066
*Phone (including area code): 651-385-3600 *E-mail: paul.drotos@ci.red-wing.mn.us

MS4 General contact (with Stormwater Pollution Prevention Program [SWPPP] implementation responsibility)

*Last name: Drotos *First name: Paul
(department head, MS4 coordinator, consultant, etc.)
*Title: Environmental Officer
*Mailing address: 315 West Fourth Street
*City: Red Wing *State: MN *Zip code: 55066
*Phone (including area code): (651) 380-3798 *E-mail: paul.drotos@ci.red-wing.mn.us

Preparer information (complete if SWPPP application is prepared by a party other than MS4 General contact)

Last name: _____ First name: _____
(department head, MS4 coordinator, consultant, etc.)
Title: _____
Mailing address: _____
City: _____ State: _____ Zip code: _____
Phone (including area code): _____ E-mail: _____

Verification

1. I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this MS4 SWPPP Application for Reauthorization form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). ☒ Yes
2. I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. ☒ Yes

Certification (All fields are required)

- ☒ Yes - I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

I certify that based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of civil and criminal penalties.

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Kay Kuhlmann
(This document has been electronically signed)

Title: City Council Administrator Date (mm/dd/yyyy): 12/02/2013

Mailing address: 315 West Fourth St.

City: Red Wing State: MN Zip code: 55066

Phone (including area code): (651) 385-3612 E-mail: kay.kuhlmann@ci.red-wing.mn.us

Note: The application will not be
processed without certification.

Stormwater Pollution Prevention Program Document

I. Partnerships: (Part II.D.1)

- A. List the **regulated small MS4(s)** with which you have established a partnership in order to satisfy one or more requirements of this Permit. Indicate which Minimum Control Measure (MCM) requirements or other program components that each partnership helps to accomplish (List all that apply). Check the box below if you currently have no established partnerships with other regulated MS4s. If you have more than five partnerships, hit the tab key after the last line to generate a new row.

☒ No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved

- B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere_Partnerships*.

While the City does not have partnerships with other regulated MS4s, its partnerships with the following organizations are an important part of how it manages stormwater:

Minnesota Cities Stormwater Coalition: Steering Committee reviews policy impacts of stormwater regulations on MS4 Cities.

Cannon River Watershed Partnership: NGO concerned with all clean water issues associated with the 6 county area of the Cannon River Watershed.

Goodhue County Soil and Water Conservation District: Water Planning Advisory Committee overseeing the County's five year Stormwater Management Plan.

Lake Pepin Legacy Alliance: Premiere advocacy group against the siltification of Lake Pepin.

Izaak Walton League of America: National organization working to protect natural resources.

II. Description of Regulatory Mechanisms: (Part II.D.2)

Illicit discharges

- A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)? ☐ Yes ☒ No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

SECTION 3.11 RULES AND REGULATIONS RELATING TO STORMWATER SERVICE

SECTION 3.13 VIOLATION A MISDEMEANOR AND/OR WILL RESULT IN A FINE AND/OR A BILL

Direct link:

<http://lf.ci.red-wing.mn.us/WebLink8/DocView.aspx?id=60050&dbid=0>

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming

convention: MS4NameHere_IDDEreg.

2. If **no**:

Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

The City of Red Wing has a stormwater pollution prevention City Ordinance which prohibits stormwater pollution caused by "throwing, discarding, or otherwise allowing materials or substances onto city streets, storm sewers, or into public drainage areas." However, in order to fully comply with the new MS4 Permit (Part III.D.3.b), within 12 months of when permit coverage is extended, City Code: SECTION 3.11 will be strengthened to include the required definitions of terms, the exemptions to the discharge prohibitions, and the necessary authority to access facilities for illicit discharge inspections and monitoring.

Required City Code changes will be prepared, reviewed, and presented to City Council and the City Clerk in time to meet the 12 month (from permit coverage extension) recodification deadline.

Construction site stormwater runoff control

- A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls? ☒ Yes ☐ No

1. If **yes**:

- a. Check which type of regulatory mechanism(s) your organization has (check all that apply):

- ☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Direct link:

ZONING CODE DIVISION 53: CANNON RIVER MANAGEMENT OVERLAY DISTRICT: A highly restrictive development ordinance to preserve the Cannon River Overlay District: ex.53-070: <http://lf.ci.red-wing.mn.us/WebLink8/DocView.aspx?id=11197&dbid=0>

ZONING CODE DIVISION 57: STORMWATER MANAGEMENT REGULATIONS: 57-050, 57-060, 57-070, 57-080, 57-090, 57-100, 57-110: <http://lf.ci.red-wing.mn.us/WebLink8/DocView.aspx?id=41494&dbid=0>

- ☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: MS4NameHere_CSWreg.

- B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? ☐ Yes ☒ No

If you answered **yes** to the above question, proceed to C.

If you answered **no** to either of the above permit requirements listed in A. or B., describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The City Planner and the Planning Commission will review a comprehensive list of changes needed to Division 57 of the Red Wing Zoning Code in order for it to comply with the current MS4 permit, including stringency provisions concerning the Construction Permit. The SWPPP Responsible Party will provide a complete list of these required changes to the Planning Commission within 10 months of permit coverage extension in order for submission to City Council for adoption and recodification within 12 months of permit coverage extension.

- C. Answer **yes** or **no** to indicate whether your regulatory mechanism(s) requires owners and operators of construction activity to develop site plans that incorporate the following erosion and sediment controls and waste controls as described in the Permit (Part III.D.4.a.(1)-(8)), and as listed below:

- | | |
|---|---|
| 1. Best Management Practices (BMPs) to minimize erosion. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. BMPs to minimize the discharge of sediment and other pollutants. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. BMPs for dewatering activities. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Site inspections and records of rainfall events | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. BMP maintenance | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 6. Management of solid and hazardous wastes on each project site. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

7. Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means. ☒ Yes ☐ No
8. Criteria for the use of temporary sediment basins. ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The City of Red Wing will satisfy regulatory mechanism requirements for Construction Site Stormwater Runoff Control by reviewing the compliance language provided by the MPCA. That language identifies the eight sections of the CGP that qualify as erosion and sediment controls or waste controls. After review, the City of Red Wing will revise its Construction Site Stormwater Runoff Control ordinances (Chapter 57 of the City's Zoning Code) to meet the requirements of the MS4 Permit (Part III.D.4.a). These revisions will be reviewed by the Engineering and Planning Departments in order for submission to the City Council and the City Clerk for recodification within 12 months of when MS4 permit coverage is extended.

The City of Red Wing's Engineering Dept. supplies regulations for inclusion in SWPPP blueprints that describe the contractors obligations during construction and afterward. These regulations will be updated to include all newly relevant information.

Post-construction stormwater management

- A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities?
☒ Yes ☐ No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

- ☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Direct link:

ZONING CODE DIVISION 57: STORMWATER MANAGEMENT REGULATIONS: 57-050, 57-060, 57-070, 57-080, 57-090, 57-100, 57-110: <http://lf.ci.red-wing.mn.us/WebLink8/DocView.aspx?id=41494&dbid=0>

- ☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_PostCSWreg.*

- B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. ☒ Yes ☐ No
2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):
- a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No
- 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of Total Suspended Solids (TSS).
 - 3) Stormwater discharges of Total Phosphorus (TP).
- b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No
- 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of TSS.
 - 3) Stormwater discharges of TP.

3. **Stormwater management limitations and exceptions:**

a. Limitations

- 1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: ☐ Yes ☒ No
- a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
 - b) Where vehicle fueling and maintenance occur.
 - c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
 - d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.
- 2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: ☐ Yes ☒ No
- a) With predominately Hydrologic Soil Group D (clay) soils.
 - b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
 - c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
 - d) Where soil infiltration rates are more than 8.3 inches per hour.
- 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. ☐ Yes ☒ No

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:

- a. Mitigation project areas are selected in the following order of preference: ☐ Yes ☒ No
- 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
 - 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
 - 3) Locations in the next adjacent DNR catchment area up-stream
 - 4) Locations anywhere within the permittee's jurisdiction.
- b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. ☐ Yes ☒ No
- c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. ☐ Yes ☒ No
- d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. ☐ Yes ☒ No
- e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. ☐ Yes ☒ No
- f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). ☐ Yes ☒ No

5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:

- a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. ☐ Yes ☒ No
- b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. ☐ Yes ☒ No
- c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

The SWPPP Responsible Party has been meeting with the City Planner, the Assistant City Planner, the Planning Advisory Commission, the City Engineer, and the City Building Inspector in order to discuss implementation of required post-construction stormwater management procedures within 12 months of SWPPP permit coverage extension. The City's post-construction regulatory mechanisms will be revised to address the new permit requirements. New regulations to address the 14 stipulations listed above in the "No" column will include a comprehensive update of Division 57 in the Zoning Code. These newly written procedures will include inspection and reporting protocols to be adopted and become operational within 12 months of when permit coverage is extended.

III. Enforcement Response Procedures (ERPs): (Part II.D.3)

- A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? ☐ Yes ☒ No
- 1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs*.
 - 2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

The City of Red Wing has procedures to enforce erosion control and IDDE violations. These procedures are not formalized in writing, but within 12 months of permit coverage extension, ERPs concerning IDDEs, construction site runoff, and post construction stormwater management will be developed, codified, and available in written format.

- B. Describe your ERPs:

When the Building Inspector or the Environmental Officer discovers a SWPPP violation from either a report, an observation, or an inspection, a verbal warning is issued to a responsible party on the site. The verbal warning requires a specific action from the responsible party within a stated time period (usually 24 hours, but highly weather-dependent). At the deadline, another site visit determines if compliance is met or if the responsible party is making adequate progress. If not, a written warning along with a denial of any subsequent building permits, or a stop work order, may be issued.

In the case of any illicit discharge, which is a misdemeanor according to City Code, the violation must be addressed immediately. Section 3.11 of the City Code, "Rules and Regulations Relating to Stormwater Service," states: "It shall be illegal to pollute the waters of the state by throwing, discarding, or otherwise allowing materials or substances onto City streets, storm sewers, or into public drainage areas where they can be transported by runoff into stormwater conveyances that will degrade stormwater and thereby add to the impairment of the waters of the state." The City Environmental Officer, the City Engineer, and the Building Inspector are all badged law enforcement officers who can issue a misdemeanor citation for illicit discharge violations.

In the case of a reportable spill within the city limits of Red Wing, the current SWPPP provisions outline specific response procedures, including the chain of command throughout abatement.

IV. Storm Sewer System Map and Inventory: (Part II.D.4.)

- A. Describe how you manage your storm sewer system map and inventory:

Red Wing uses an advanced SQL database program called CarteGraph, with an ESRI graphic interface, to inventory and manage stormwater infrastructure. The system was designed in 2007 to integrate SWPPP requirements with GASB and utility locating in order to insure accuracy through continuous updating. The City's Infrastructure Asset Coordinator is responsible for updates and works with the City's Environmental Officer to include inspection information and other relevant data into the CarteGraph program.

- B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:
1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. ☒ Yes ☐ No
 2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. ☒ Yes ☐ No
 3. Structural stormwater BMPs that are part of the permittee's small MS4. ☒ Yes ☐ No
 4. All receiving waters. ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

- C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:
1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. ☐ Yes ☒ No
 2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. ☐ Yes ☒ No
- D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.
1. A unique identification (ID) number assigned by the permittee. ☒ Yes ☐ No
 2. A geographic coordinate. ☒ Yes ☐ No
 3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. ☒ Yes ☐ No

If you have answered **yes** to all above requirements, and you have already submitted the Pond Inventory Form to the MPCA, then you do not need to resubmit the inventory form below.

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The City of Red Wing has identified, determined the coordinates, and inventoried most of its stormwater ponds and will provide a complete listing of its stormwater ponds using the Pond Inventory Form within 12 months from when permit coverage is granted. All wetlands and lakes that collect stormwater via constructed conveyances will also be inventoried within 12 months of permit coverage extension.

- E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA on the form provided on the MPCA website at: <http://www.pca.state.mn.us/ms4>, according to the specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention: *MS4NameHere_inventory*. ☐ Yes ☒ No

If you answered **no**, the inventory form must be submitted to the MPCA MS4 Permit Program within 12 months of the date permit coverage is extended.

V. Minimum Control Measures (MCMs) (Part II.D.5)

A. MCM1: Public education and outreach

1. The Permit requires that, within 12 months of the date permit coverage is extended, existing permittees revise their education and outreach program that focuses on illicit discharge recognition and reporting, as well as other specifically selected stormwater-related issue(s) of high priority to the permittee during this permit term. Describe your **current** educational program, including **any high-priority topics included**:

The City of Red Wing no longer has a community newsletter. Stormwater pollution information is addressed through leaflets distributed in water bills. Other articles are published in the twice-weekly local newspaper, The Republican Eagle, and its free advertising handout.

Every year around Earth Day, the City of Red Wing engages all 7th grade science students in a one period long classroom presentation about fresh water and stormwater issues. Stormwater Pollution Prevention will also be a topic for World Water Week for fifth graders. Third graders participate in stormwater education activities sponsored by the Izaak Walton League every May. Boy Scouts, Girl Scouts, and Environmental Learning Center students also participate in installing catch basin stampings and distributing neighborhood informational door hangings.

Red Wing's Public Access Channel 6 presents over 100 hours of stormwater informational videos to the public every year. The City's website includes a stormwater page with information about our Stormwater Utility and the SWPPP program, including the MS4 permit itself.

- List the categories of BMPs that address your public education and outreach program, including the distribution of educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Newsletters/ Flyers	2 billing inserts in water bills per year (5,400 per mailing).
Cable Access Channel (Charter, HBC)	At least 100 hours of stormwater video programming.
Catch Basin Stampings	Attach at least 25 "No Dumping" stampings per year.
Informational Door Hangers	Distribute at least 100 door hangers in neighborhoods receiving catch basin stampings
7 th Grade Science classes focused on SWPPP	Students are taught during 5 classroom periods.
Stormwater and watershed information	Informational articles are published in the local newspaper at least 4 times per year.
Support a strong recycling education program to keep recyclables off the street and out of storm sewers.	Public appearances by Red Wing's recycling mascot, Rubin the Blue Bin, encourages clean streets through recycling.
"Mutt Mitt" dispensers in public parks provide approximately 9,000 uses per year for proper pet waste disposal.	Continue to provide "Mutt Mitts" for park visitors, providing cleaner water through proper pet waste disposal.
BMP categories to be implemented	Measurable goals and timeframes
Website Improvement	Review and update website with current information 4 times a year. Continue to count web-site hits.
Local World Water Week Educational Event (actual dates depends on school curriculum)	Involve 5 th grade students in stormwater pollution education. Document program for continuous improvement and count number of participants.
Izaak Walton 3 rd Grade Environmental Day	Involve 3 rd graders in pollution prevention to make connections between clean water, and swimming and fishing. Document program and count number of participants.

- Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Paul Drotos, City Environmental Officer

B. MCM2: Public participation and involvement

- The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

While formal input on the SWPPP has been somewhat limited, public participation and involvement in SWPPP issues and outcomes has been actively expressed by citizens reporting stormwater pollution violations to city officials. These reports, which remain anonymous, are taken seriously and are actively responded to. Whether it is illegal dumping of leaves into streets, vehicles leaking fluids, discarded cigarette butts, or restaurants washing equipment outside, citizens prove their understanding and dedication to SWPPP principles by giving direct input on stormwater pollution problems. The city actively solicits public input by responding to these reports as soon as possible and if the outcome is not obvious then it contacts the reporting citizen with mitigation information.

The annual SWPPP meeting, which is held around Earth Day as part of a regular City Council Meeting, is an important part of our public stormwater participation and involvement outreach. By presenting current and relevant information about our SWPPP to the City Council, we inform our elected leaders about the details required in our annual report. Televised City Council meetings have a high viewership in Red Wing which guarantees information to the public about our SWPPP program. Each Annual Meeting presentation includes an invitation for citizens to get involved in stormwater issues and

participate in projects like the annual river clean-ups on the Mississippi and Cannon Rivers and also the hazardous material collections held in Red Wing.

- List the categories of BMPs that address your public participation/involvement program, including solicitation and documentation of public input on the SWPPP. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Annual Meeting during City Council Meeting.	Elected official involvement and high citizen viewership.
Input from concerned persons are reviewed and acknowledged.	Comments and suggestions by concerned citizens are reviewed and a written response is sent within 30 days.
Rain barrel workshops sponsored by the Cannon River Watershed Partnership (CRWP).	A one hour multi-media presentation and hands-on rain barrel construction class is a popular Community Education class. Participants are counted.
BMP categories to be implemented	Measurable goals and timeframes
Local World Water Week Educational Event	Annual 5-7 grade science field trip including stormwater education.
Izaak Walton 3 rd Grade Environmental Day	Involve 3 rd graders in pollution prevention to make connections between clean water, and swimming and fishing. Document program for continuous improvement and count number of participants.

- Do you have a process for receiving and documenting citizen input? ☒ Yes ☐ No

If you answered **no** to the above permit requirement, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

- Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Paul Drotos, City Environmental Officer

C. MCM 3: Illicit discharge detection and elimination

- The Permit (Part III.D.3.) requires that, within 12 months of the date permit coverage is extended, existing permittees revise their current program as necessary, and continue to implement and enforce a program to detect and eliminate illicit discharges into the small MS4. Describe your current program:

A mandatory annual meeting for all outside workers is scheduled every spring to discuss employee's stormwater responsibilities about IDDE and other relevant SWPPP issues. The importance of reporting and mitigation are stressed. Professionally produced videos are shown and discussed and a test is administered. All part-time summer workers are also educated about their Stormwater Pollution Prevention obligations during their mandatory orientation meeting.

- Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?

- Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.) Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). ☒ Yes ☐ No
- Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. ☒ Yes ☐ No
- Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in ☒ Yes ☐ No

illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation.

- d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. ☒ Yes ☐ No
- e. Procedures for the timely response to known, suspected, and reported illicit discharges. ☒ Yes ☐ No
- f. Procedures for investigating, locating, and eliminating the source of illicit discharges. ☒ Yes ☐ No
- g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. ☒ Yes ☐ No
- h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

3. List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Illicit Discharge Employee Training	All employees working outside receive I.D.D.E. training.
Illicit Discharge Part-time Training	All summer help employees receive I.D.D.E. training.
City telephone operators immediately forward I.D.D.E. information to responsible parties.	The City's answering system includes after hours numbers for reporting I.D.D.E. Staff is trained on who to call.
Illicit Discharge Detection	Employees consistently report illicit discharges from observations or inspections in ponds, outfalls or other BMPs.
Illicit Discharge Response	Reports of illicit discharge are responded to immediately.
Goodhue County Health Department manages septic systems.	The G.C.H.D. will continue to report annually on septic system installs and also overflow problems.
Identify non-stormwater flows.	Continue to monitor non-stormwater flow occurrences to make sure flows do not add pollution.
BMP categories to be implemented	Measurable goals and timeframes
Continue to work with City Deputy Directors to implement Industrial Stormwater Permits and sampling protocols.	Insure industrial permitted areas and significant materials are dealt with properly and industrial pollution threats are managed appropriately.

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? ☐ Yes ☒ No

If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

The City of Red Wing will require the site responder to an illicit discharge (one that rises to the level of a water pollution threat) to provide a written report about all aspects of the illicit discharge, including discovery, reporting, inspection, and mitigation. Specifics will include location, time, date, and actions taken. Extenuating circumstances along with an assessment of volumes involved and the effectiveness of the mitigation procedures will also be included. All Minnesota Duty Officer information will also be included.

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Paul Drotos, City Environmental Officer

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

Division 57 of the City's Zoning Code addresses building permits, grading permits, and grading plan reviews, which require a stormwater management plan for one acre or more of land disturbance. The current requirements include protocols for submittal, mapping, topography, hydrology, soils, vegetation, floodplains, wetlands, trout streams etc. Relevant code citations include: 57-050 Scope and Effect, 57-060 Stormwater Management Plan-Submittal Requirements, 57-070 Plan Review Procedure, 57-080 General Standards, 57-090 Lawn Maintenance and Vegetation Removal, 57-100 Violation and Penalties, 57-110 Other Controls.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
- Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? ☒ Yes ☐ No
 - Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? ☒ Yes ☐ No
 - Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? ☒ Yes ☐ No
 - Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - Does your program include procedures for identifying priority sites for inspection? ☒ Yes ☐ No
 - Does your program identify a frequency at which you will conduct construction site inspections? ☒ Yes ☐ No
 - Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? ☒ Yes ☐ No
 - Does your program include a checklist or other written means to document construction site inspections when determining compliance? ☒ Yes ☐ No
 - Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? ☒ Yes ☐ No
 - Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? ☒ Yes ☐ No
 - Does your program retain construction site inspection checklists or other written materials used to document site inspections? ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Permit Application System	Process all applications within 30 days of receipt for building permits, grading permits, or stormwater management plans on construction sites disturbing one acre or more of land.
Required Erosion and Sediment Controls throughout construction process.	Silt fence, rock entrances, inlet protection, vegetation establishment, street sweeping, dewatering are some of the techniques used throughout a construction process.

BMP categories to be implemented	Measurable goals and timeframes
Permit Update	Update SWPPP permit and ordinances to meet MPCA General Permit to Discharge Stormwater Associated with Construction Activity (Construction Permit).
Factsheet	Develop factsheet to accompany permit application to assist contractors with understanding permit regulations.
Notification of Permit Changes	Explain permit changes to construction applicants when necessary.
Checklist for Site Plan Review	Update procedures for site plan review on an annual basis and incorporate into written procedures.

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Jay Owens, City Engineer; Brian Peterson, City Planner; Frank Peterson, City Building Inspector; Paul Drotos, City Environmental Officer

E. MCM 5: Post-construction stormwater management

1. The Permit (Part III.D.5.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a post-construction stormwater management program. Describe your current program:

The City requires continuous stormwater pollution prevention after all new construction is completed. Calculated peak discharge rates have been used to determine the extent of structural and non-structural BMPs. All land surface disturbances require re-vegetation. Current BMPs include: natural infiltration, flow attenuation, stormwater retention and detention. Regular inspections are coupled with prescribed maintenance response procedures.

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity? ☒ Yes ☐ No
3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):
- a. Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a), including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance? ☒ Yes ☐ No
- b. All supporting documentation associated with mitigation projects that you authorize? ☒ Yes ☐ No
- c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))? ☒ Yes ☐ No
- d. All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved? ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the steps that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Required Structural and Non-structural BMPs	All building sites require immediate stormwater pollution prevention with suggested hierarchy of: 1.) Natural Infiltration, 2.) Flow attenuation, 3.) Stormwater retention, 4.) Stormwater detention.

Prescribed Retention Basins	Retention basins have been used for slowing stormwater leaving a new development to the predevelopment runoff rate.
Land Surface Disturbances	Sites must be mulched, seeded, sodded or otherwise protected to prevent erosion, siltation, sedimentation, and washing.
Long Term Operation and Maintenance	Regular inspections with maintenance feed-back to Public Works. Annual inspection records maintained.
BMP categories to be implemented	Measurable goals and timeframes
For New Development Projects	Within 12 months of permit coverage extension, codify regulations for building sites of one acre or more so that there is no net increase from pre-project conditions of: 1.) Stormwater discharge volume, 2.) Stormwater discharge of TSS, 3.) Stormwater discharge of TP.
For Redevelopment Projects	Within 12 months of permit coverage extension, codify regulations for building sites of one acre or more so that there is a net reduction from pre-project conditions of: 1.) Stormwater discharge volume, 2.) Stormwater discharge of TSS, 3.) Stormwater discharge of TP.
Codify: 3.) Stormwater Management Limitations and Exceptions, 4.) Mitigation Provisions, and 5.) Long Term Maintenance of Structural Stormwater BMPs as cited in this SWPPP Document.	Within 12 months of permit coverage, codify regulations for building sites of one acre or more to comply with this SWPPP Document (p.5) documenting changes required in Post-construction stormwater management.
For increased impervious surfaces totaling 1 or more acres in area.	Conform to the current General Permit Authorization to Discharge Stormwater Associated with Construction Activity Under the NPDES/ State Disposal System Program without being less restrictive.

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Jay Owens, City Engineer; Brian Peterson, City Planner; Paul Drotos, City Environmental Officer

F. MCM 6: Pollution prevention/good housekeeping for municipal operations

1. The Permit (Part III.D.6.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement an operations and maintenance program that prevents or reduces the discharge of pollutants from the permittee owned/operated facilities and operations to the small MS4. Describe your current program:

The City of Red Wing provides annual training to all field employees about stormwater pollution prevention and illicit discharges (See MCM 3 above). This training includes 8 important pollution prevention practices: 1.) Vehicle and equipment washing, 2.) Vehicle and equipment maintenance, 3.) Good housekeeping, 4.) Spill reporting and response, 5.) Street maintenance, 6.) Outdoor storage of materials and wastes, 7.) Landscaping and lawn care, 8.) Illicit discharge detection and reporting. Street sweeping is a constant component of good housekeeping. The City does annual inspections of all sump manholes. 20% of all stormwater infrastructure including MS4 outfalls, sediment basins, and ponds are inspected on an annual rotating basis. The City owns and operates one site for material handling and it is inspected annually. Scheduled stormwater infrastructure inspections along with ad hoc Public Works inspections are the foundation of necessary repair and replacement of stormwater infrastructure. Inspection records are maintained, and system maintenance and improvement are reported to elected officials at the annual meeting.

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? ☐ Yes ☒ No
3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:
- Within 12 months of the date permit coverage is extended, the City of Red Wing will develop and maintain an inventory of City facilities that may contribute pollutants to stormwater discharges.*
4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s*

(<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Maintain rigorous municipal employee training program.	Provide mandatory SWPPP training for all City field workers.
Maintain rigorous street sweeping program.	Sweep city streets at least two times per year and enforce street sweeping requirements for contractors tracking from construction sites.
Inspect and/or clean sump manholes	Inspect and/or clean all sump manholes annually.
Inspect 20% of outfalls and ponds while responding to all reports of infrastructure inadequacy or failure.	Inspect and record the information on a minimum of 20% of outfalls and ponds every year and report information about required maintenance to the Public Works Department.
Inspect the City's material handling site for pollution or erosion problems.	Increase annual reporting regarding the City's material handling site to quarterly reporting.
BMP categories to be implemented	Measurable goals and timeframes
Standardize "Environmental Good Housekeeping Reminder Notice."	Create a citation style written warning for minor stormwater code violations within 12 months of permit coverage extension.
Maintain "Environmental Good Housekeeping Thank You Notice"	Create a positive reinforcement stormwater hand-out within 12 months of permit coverage extension.
Provide Controlled Dumping Area for Directional Boring Slurry (mostly bentonite).	Provide and maintain ongoing controlled dumping site for fine particulate slurry used in directional boring during the construction season.
Continue to use de-icing compounds such as Ice Melt 55 to restrict the use of salt and sand on City streets.	Continue to investigate new winter road maintenance procedures and practices to limit TSS and chloride pollution. Inventory and record road applications every year.

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? ☐ Yes ☒ No
- a. If **no**, continue to 6.
- b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>. Is a map including the following items available for your MS4:
- 1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? ☐ Yes ☐ No
- 2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? ☐ Yes ☐ No
- c. Have you developed and implemented BMPs to protect any of the above drinking water sources? ☐ Yes ☐ No
6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? ☒ Yes ☐ No
7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? ☐ Yes ☒ No
8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:
- a. Addresses the importance of protecting water quality? ☒ Yes ☐ No
- b. Covers the requirements of the permit relevant to the duties of the employee? ☒ Yes ☐ No
- c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? ☒ Yes ☐ No

9. Do you keep documentation of inspections, maintenance, and training as required by the Permit ☒ Yes ☐ No (Part III.D.6.h.(1)-(5))?

If you answered **no** to any of the above permit requirements listed in **Questions 5 – 9**, then describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

#7: Current inspection procedures for structural stormwater BMPs, ponds, and outfalls already meet new permit requirements, however, the current annual inspection of stockpile, storage, and material handling areas will be increased to quarterly inspections within 3 months of the date that permit coverage is extended.

10. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Paul Drotos, City Environmental Officer; Bob Stark, Deputy Director Utilities

VI. Compliance Schedule for an Approved Total Maximum Daily Load (TMDL) with an Applicable Waste Load Allocation (WLA) (Part II.D.6.)

- A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? ☐ Yes ☒ No
1. If **no**, continue to section VII.
 2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention: *MS4NameHere_TMDL*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VII. Alum or Ferric Chloride Phosphorus Treatment Systems (Part II.D.7.)

- A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? ☐ Yes ☒ No
1. If **no**, this section requires no further information.
 2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VIII. Add any Additional Comments to Describe Your Program

The proximity of Red Wing to the Mississippi River has highlighted the importance of clean water to the Red Wing Community throughout its history. City leadership and management have continuously supported SWPPP initiatives by instituting a Stormwater Utility Fee, which is used for implementing SWPPP regulations and programs. Red Wing has also systematically developed a stormwater infrastructure information and assessment program using GIS technology and a sophisticated SQL database program. Recently, the City purchased a mobile camera vehicle for sewer inspections and also commissioned a comprehensive tunnel engineering survey. Red Wing has been an active participant in numerous clean water initiatives, including the recently completed Mississippi Makeover project. Red Wing continues to host and participate in various clean water initiatives with outstanding civic capacity for environmental issues. Red Wing built its first municipal combined sewers in 1885 for flood control. By 2004, they were all separated. Presently, it relies on its MCMs, BMPs, and especially its citizens to help prevent runoff pollution.